Competitive Carriers Association
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January 4, 2013

Via ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: WT Docket No. 12-69

Dear Ms. Dortch:

On January 2, 2013, Steven Berry, Tim Donovan, Sean Spivey and myself, along with Trey Hanbury and Doug Hyslop (on behalf of the Competitive Carriers Association), Ben Moncrief of C Spire Wireless, Grant Spellmeyer and Darryl Degruy of US Cellular, and Scott Wills of Vulcan Wireless along with Paul Kolodzy and Michele Farquhar (on behalf of Vulcan Wireless) met with Jonathan Chambers, Acting Chief of the Office of Strategic Planning & Policy Analysis and Henning Schulzrinne, Chief Technology Officer, to discuss technical and policy considerations surrounding restored interoperability in the Lower 700 MHz Band. A PowerPoint presentation was also offered during this meeting, a copy of which is attached to this notice.

CCA described its extensive and unsuccessful efforts to reach an industry solution to the lack of interoperability in the Lower 700 MHz band and then CCA member companies reviewed the benefits of restoring Lower 700 MHz interoperability. As detailed in the attached presentation, these benefits include: (1) improving the timeliness and affordability of consumers' access to broadband devices; (2) lowering the cost to consumers of switching from AT&T to competitive carriers and from competitive carriers to AT&T; (3) accelerating the expansion of technical innovations, such as carrier aggregation, to the Lower 700 MHz A Block frequencies; and (4) removing the cloud of uncertainty that has frustrated extensive private-sector investment and deployment in Lower 700 MHz A Block spectrum resources. CCA then explained why the cost savings and innovation benefits of Lower 700 MHz interoperability are entirely independent of the 3G network technology, if any, that a device may use. Among other reasons, the widespread use of multi-technology chipsets means that fall back economies associated with Lower 700 MHz interoperability extend to multiple 3G air-interfaces. Therefore consumers will enjoy the benefits of interoperability regardless of whether a particular device falls back to a CDMA or a GSM network when a 4G LTE network is unavailable.

CCA member companies next addressed several reasons why a "roaming only" solution (where a Band 12 device operating over B or C Block spectrum would use Band 17 channel signaling) would be undesirable. Among other things, such an arrangement would not allow for bi-directional roaming and would not address economies of scale or prioritization of band class development associated with a fully functional Band Class 12 ecosystem.

CCA and its members then reviewed the differences between the technical studies performed by Doug Hyslop and Paul Kolodzy and V-Comm, on the one hand, versus those performed by AT&T and Qualcomm, on the other. Specifically, CCA and its member companies discussed V-Comm's conclusion that "the potential for harmful interference due to Band 12 vs. Band 17 operation for B or C-Block operators is effectively non-existent."[1] Parties also explained how, of the 26 Channel 51 facilities V-Comm studied, only eight locations had any potential to create interference conditions on the ground and only when in very close proximity to the DTV tower locations themselves.[2] The V-Comm study further noted that, "[w]ith the application of reasonable and realistic Radio Frequency design assumptions and real world conditions (clutter losses, customer usage patterns, and application loading requirements) and the field confirmation of Channel 51 signal strengths, the potential for harmful interference is effectively eliminated altogether."[3] US Cellular discussed its deployment on ten megahertz of A Block spectrum in Waterloo, Iowa, which is within the footprint of a Channel 51 broadcaster, as a real world example of why alleged concerns regarding interference are misplaced.

CCA and its member companies concluded the meeting by asking the Commission to act quickly to restore interoperability to the Lower 700 MHz A, B and C Blocks.

Sincerely,

/s/ Rebecca Murphy Thompson

Rebecca Murphy Thompson
General Counsel

Attachment

cc: Jonathan Chambers
Henning Schulzrinne

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[1] *See* Reply Comments of V-Comm, L.L.C., Prepared on behalf of Cavalier Wireless, Continuum 700, King Street Wireless, MetroPCS Communications, Inc., Vulcan Wireless LLC, WT Docket 12-69 (filed July 13, 2012), *available at* http://apps.fcc.gov/ecfs/document/view?id=7021986769.

[2] According to the V-Comm study, the eight digital television stations that, under worst case scenarios, could have the "potential" to create interference in the immediate vicinity of the television transmitter location are: WSST, Cordele, GA (located in a remote farmland area); WEPX, Greenville, NC (located in a remote field); KOHD, Bend, OR (located on a mountaintop surrounded by trees); WHLV, Cocoa Beach, FL (located in a remote, unpopulated area); WLAJ, Lansing, MI (located in a field in a rural area); WTAE, Pittsburgh, PA (located on a hilltop away from the Pittsburgh metro area); WAGV, Harlan, KY (located on a remote hilltop); KGAN, Cedar Rapids, IA (located in some proximity to a low-density, rural population, but where typical LTE link budgets would readily overcome any "potential" interference). *Id.*

[3] *Id.*